IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

CORDELL JOHNSON,
Plaintiff,

vs. Case No. CIV-16-1061-R

CORRECTIONS CORPORATION OF AMERICA, INC.,

and,

TERRANCE LOCKETT,
Defendants.

DEFENDANTS' FINAL WITNESS LIST

COMES NOW Defendant CCA, pursuant to this Court's Amended Scheduling Order, and hereby submitting the following witness list.

WITNESSES:

* denotes "likely to be called," as directed by this Court's Scheduling Order.

			Testimony
			Mr. Byrd was facility Warden at Cimarron
			Correctional Facility on 9/12/15, the date
			of the incident underlying Plaintiff's
			complaint. He was present at the prison
			facility and responded to the incident on
			the CN housing unit and established an
			incident command post. He will testify
		c/o CCF	about the prison facility's policies, security
		3200 Kings Hwy	operations, staffing, training, and
		Cushing, Oklahoma	supervision of staff and inmates. He will
		74023	also testify regarding Plaintiff and
1.	Raymond Byrd*	918.225.3336	Plaintiff's institutional history.
		c/o CCF	Mr. Cox was facility Chief of Security on
2.	Larry Cox*	3200 Kings Hwy	9/12/15. He responded to the incident on

		G 11 0111	1 0011 1 1 1 1 1 1 1 1
		Cushing, Oklahoma	the CN housing unit and helped direct the
		74023	facility's response to the inmate gang
		918.225.3336	fight. He is expected to testify about the
			prison facility's policies, security
			operations, staffing, training, and
			supervision of security staff and inmates.
			He will also testify regarding Plaintiff and
			Plaintiff's institutional history.
			Mr. Meszaros was the Shift Captain on
			9/12/15 at the time of the incident on the
			CN housing unit. He responded to the CN
			housing unit incident and helped direct the
		c/o CCF	emergency response. He will testify about
		3200 Kings Hwy	the prison facility's security operations,
		Cushing, Oklahoma	staffing, training, and supervision of staff.
		74023	He will also testify regarding Plaintiff's
3.	Robert Meszaros*	918.225.3336	institutional history.
<i>J</i> .	1100011 1110024100	, 10.225.5550	Mr. Hunsucker was the Shift Lieutenant on
			9/12/15 at the time of the incident on the
		a/a CCE	
		c/o CCF	CN housing unit. He responded to the CN
		3200 Kings Hwy	housing unit incident and helped direct the
		Cushing, Oklahoma	emergency response. He will testify about
		74023	the prison facility's security operations,
4.	Scott Hunsucker*	918.225.3336	staffing, training, and supervision of staff.
			Mr. Hilligoss was Chief of Unit
			Management for Cimarron Correctional
			Facility on 9/12/15. He was not present at
			the facility at the time of the incident. He
			subsequently reviewed incident response
			materials and spoke with staff and inmates
			regarding the incident of 9/12/15. He will
			testify about the prison facility's unit
			management, housing and security
			operations, inmate security threat groups,
			staffing, training, and supervision of staff
		c/o CCF	and inmates. He will also testify regarding
		3200 Kings Hwy	Plaintiff and Plaintiff's institutional
		Cushing, Oklahoma	history. Following the incident of 9/12/15,
		74023	he assisted in the identification of inmates
5.	John Hilligoss*	918.225.3336	involved in the incident.
<u> </u>			Mr. Battles was the Unit Manager for the
		c/o CCF	CN housing unit at the time of the 9/12/15
			_
		3200 Kings Hwy	incident. He came to the facility shortly
		Cushing, Oklahoma	after the incident had ended. He entered
		74023	the housing unit after the incident had
6.	Tommy Battles*	918.225.3336	occurred and subsequently reviewed

			incident response materials and spoke with
			staff and inmates regarding the incident of
			9/12/15. He is expected to testify about the
			*
			prison facility's housing and security
			operations, inmate security threat groups,
			staffing, training, and supervision of staff
			and inmates. He will also testify regarding
			Plaintiff and Plaintiff's institutional
			history. Following the incident of 9/12/15,
			he assisted in the identification of inmates
			involved in the incident.
			Ms. Shannon was the Case Manager for
			inmates assigned to the CN housing unit at
			the time of the 9/12/15 incident. She was
			not present at the facility at the time of the
			incident. She is expected to testify about
			the prison facility's housing and security
			operations, inmate security threat groups,
		c/o Darrell Moore	supervision of inmates, and Plaintiff and
			=
		J. Ralph Moore, P.C.	Plaintiff's institutional history. Following
		P.O. Box 368	the incident of 9/12/15, she assisted in the
		Pryor, OK 74362	identification of inmates involved in the
7.	Lisa Shannon*	(918) 825-0332	incident.
			Mr. Lockett was a Corrections Officer
			posted inside the CN housing unit on
			9/12/15 and at the time of the incident
			underlying Plaintiff's complaint. He is
			expected to testify as regards the incident
			of 9/12/15. He is also expected to testify as
			regards his training as a corrections officer
			and his own medical, social, educational,
8.	Terrance Lockett*	C/O William Lunn	and employment history.
			Ms. Tanner was posted as a Corrections
			Officer in another housing unit at the
			prison facility at the time of the 9/12/15
			incident. She responded to the incident on
			the CN housing unit, she entered the
			housing unit, assisted in restraining
		-/- D11 3 4	inmates and participated in the emergency
		c/o Darrell Moore	response. She is expected to testify about
		J. Ralph Moore, P.C.	the prison facility's security operations,
		P.O. Box 368	staffing, training, and supervision of
		Pryor, OK 74362	inmates. She will also testify regarding
9.	Jessica Tanner*	(918) 825-0332	Plaintiff's institutional history.
		c/o CCF	Mr. Cruz was working as a Corrections
1			
10	Hector Cruz*	3200 Kings Hwy	Counselor at the prison facility at the time

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	Cushing, Oklahoma	of the 9/12/15 incident. He responded to
	74023	the incident on the CN housing unit, he
	918.225.3336	entered the housing unit, assisted in
		restraining inmates and securing the
		housing unit, and escorted inmates to other
		locations within the prison facility.
		Ms. Walls was posted as a Corrections
		Officer in another housing unit at the
		prison facility at the time of the 9/12/15
		incident. She responded to the incident on
		the CN housing unit, entered the housing
		unit, assisted in restraining inmates, and
		participated in the emergency response.
		She is expected to testify about the prison
		facility's security operations, staffing,
		training, and supervision of inmates. She is
	c/o Darrell Moore	also expected to testify regarding
	J. Ralph Moore, P.C.	Plaintiff's institutional history. Following
	P.O. Box 368	the incident of 9/12/15, she assisted in the
		l '
11 77 77 11	Pryor, OK 74362	identification of inmates involved in the
11 Vanessa Walls	(918) 825-0332	incident.
		Ms. Rucker was posted as a Corrections
		Officer in another housing unit at the
		prison facility at the time of the 9/12/15
		incident. She responded to the incident on
		the CN housing unit, she entered the
		housing unit, assisted in restraining
		inmates and participated in the emergency
	c/o Darrell Moore	response. She is expected to testify about
	J. Ralph Moore, P.C.	the prison facility's security operations,
	P.O. Box 368	staffing, training, and supervision of
	Pryor, OK 74362	inmates. She is also expected to testify
12 Cassandra Rucker*	(918) 825-0332	regarding Plaintiff's institutional history.
12 Cassanura Rucker	(710) 023-0332	· ·
		Mr. Neefe was the facility Chaplain at the
		prison facility at the time of the 9/12/15
	/ COE	incident. He responded to the incident on
	c/o CCF	the CN housing unit, entered the housing
	3200 Kings Hwy	unit, assisted with the emergency response,
	Cushing, Oklahoma	provided CPR to injured inmates, and
	74023	assisted in the movement of injured
13 Michael Neefe*	918.225.3336	inmates.
	c/o CCF	Ms. Silvers was posted as a Corrections
	3200 Kings Hwy	Officer in another housing unit at the
	Cushing, Oklahoma	prison facility at the time of the 9/12/15
	74023	incident. She responded to the incident and
14 Jennifer Silvers	918.225.3336	participated in the emergency response.
I I Jemmer Dirvers	710.223.3330	paracipated in the emergency response.

			She is expected to testify about the
			incident response and movement of injured
			inmates.
			Ms. Patterson was working as a Licensed
			Practical Nurse at the prison facility at the
			time of the 9/12/15 incident. She
			responded to the incident on the CN
			housing unit, entered the housing unit,
		c/o CCF	assisted in providing medical care to
		3200 Kings Hwy	injured inmates on the housing unit, and
		Cushing, Oklahoma	continued providing medical care to
		74023	injured inmates in the prison facility's
15	Teresa Patterson*	918.225.3336	medical clinic.
			Ms. Palmer-Neefe was working as a
			Registered Nurse at the prison facility at
			the time of the 9/12/15 incident. She
			responded to the incident on the CN
			housing unit, entered the housing unit,
			assisted with the emergency medical care
			response on the CN housing unit and in the
			prison facility's medical clinic. She is
		c/o CCF	expected to testify about the prison
		3200 Kings Hwy	facility's medical operations during the
	r D1	Cushing, Oklahoma	time of the incident and medical care
1.0	Laura Palmer-	74023	provided to Plaintiff until his release from
16	Neefe*	918.225.3336	prison during May 2016.
			Mr. Melendez was posted as a Corrections
			Officer at the prison facility at the time of the 9/12/15 incident. He responded to the
			incident on the CN housing unit, entered
			the housing unit, assisted in restraining
		c/o CCF	inmates and participated in the emergency
		3200 Kings Hwy	response. He is expected to testify about
		Cushing, Oklahoma	the prison facility's security operations,
		74023	staffing, training, and supervision of
17	Juan Melendez*	918.225.3336	inmates.
- 7			Mr. Cruz was posted as a Corrections
			Officer at the prison facility at the time of
			the 9/12/15 incident. He responded to the
			incident on the CN housing unit, entered
		c/o CCF	the housing unit, assisted in restraining
		3200 Kings Hwy	inmates and participated in the emergency
		Cushing, Oklahoma	response. He is expected to testify about
		74023	the prison facility's security operations,
18	Nelson Cruz*	918.225.3336	staffing, training, and supervision of

		inmeter. He is also expected to testify
		inmates. He is also expected to testify
		regarding Plaintiff's institutional history.
		Mr. Williams was posted as a Corrections
		Officer, working in Central Control in the
		prison facility at the time of the 9/12/15
	c/o CCF	incident. He assisted with coordination of
	3200 Kings Hwy	the emergency response to the incident on
	Cushing, Oklahoma	the CN housing unit. He is expected to
	74023	testify about the prison facility's security
19 John Williams*	918.225.3336	operations on 9/12/15.
		Ms. Pearman was posted as a Corrections
		Officer in another housing unit at the
		prison facility at the time of the 9/12/15
		incident. She responded to the incident on
		<u>-</u>
		the CN housing unit, she entered the
		housing unit, assisted in restraining
	/ D 113.6	inmates and participated in the emergency
	c/o Darrell Moore	response. She is expected to testify about
	J. Ralph Moore, P.C.	the prison facility's security operations,
	P.O. Box 368	staffing, training, and supervision of
	Pryor, OK 74362	inmates. She is also expected to testify
20 Megan Pearman*	(918) 825-0332	regarding Plaintiff's institutional history.
		Ms. Bass was working as a Licensed
		Practical Nurse at the prison facility at the
		time of the 9/12/15 incident. She
		responded to the incident on the CN
		housing unit, entered the housing unit,
		assisted in providing medical care to
		injured inmates on the housing unit, and
	c/o Darrell Moore	continued providing medical care to
	J. Ralph Moore, P.C.	injured inmates in the prison facility's
	P.O. Box 368	medical clinic. She is also expected to
	Pryor, OK 74362	_
21 Michelle Bees*	,	testify regarding Plaintiff's institutional
21 Michelle Bass*	(918) 825-0332	history. Mr. Schechter was a Senior Corrections
		Officer at the time of the 9/12/15 incident.
		He responded to the prison facility at the
		time of the incident on the CN housing
		unit. He accompanied emergency vehicles
		to the hospital in Cushing and provided
	c/o CCF	security over-watch on Plaintiff at the
	3200 Kings Hwy	hospital in Cushing, Oklahoma. He is
	Cushing, Oklahoma	expected to testify about the prison
	74023	facility's security operations, staffing,
22 Jason Schechter	918.225.3336	training, and supervision of inmates. He is

			also expected to testify regarding
			Plaintiff's institutional history.
			·
			Mr. Campbell was a Corrections Officer at
			the time of the 9/12/15 incident. He
			responded to the prison facility at the time
			of the incident on the CN housing unit. He
			was posted as security over-watch on
			Plaintiff at the hospital in Cushing,
		c/o CCF	Oklahoma. He is expected to testify about
		3200 Kings Hwy	the prison facility's security operations,
		Cushing, Oklahoma	staffing, training, and supervision of
		74023	inmates. He is also expected to testify
23	Gary Campbell*	918.225.3336	regarding Plaintiff's institutional history.
		ODOC	
		3400 Martin Luther	Mr. Williams was the Division Manager,
		King Ave	Division of West Institutions, Oklahoma
24	Greg Williams*	OKC, OK	Department of Corrections.
		ODOC	
		3400 Martin Luther	Mr. Baker was a Contract Monitor for the
		King Ave	Oklahoma Department of Corrections
25	Phillip Baker*	OKC, OK	working at Cimarron Correctional Facility.
		ODOC	
		3400 Martin Luther	Ms. Cooper was a Contract Monitor for
		King Ave	the Oklahoma Department working at
26	Natalie Cooper	OKC, OK	Cimarron Correctional Facility.
			Mr. Hert is an Agent with the Office of
			Inspector General for the Oklahoma
			Department of Corrections. He is expected
		ODOC	to testify regarding an investigation he
		3400 Martin Luther	performed of the 9/12/15 incident on the
		King Ave	CN housing unit, Cimarron Correctional
27	Robert Hert, III*	OKC, OK	Facility.
		c/o Oklahoma	
		Department of	
		Corrections, DOC	
		#672911,	Ms. Hamlin is an inmate who on 9/12/15
		Eddie Warrior	had been romantically involved with one
		Correctional	of the deceased offenders, Kyle Tiffee.
		P.O. Box 315	She is expected to testify to her knowledge
		Taft, OK 74463-	regarding the prison gang activities of the
28	Haley Hamlin*	0315	Irish Mob and the UAB.
	•	c/o J. Spencer	
		Bryan,	Ms. Tiffee is a former OK DOC inmate
		9 E. 4 th Street, Ste.	and the mother of one of the deceased
		307,	offenders, Kyle Tiffee. She is expected to
29	Terry Tiffee*	Tulsa, OK 74103	testify regarding her knowledge of the

		918.935.2777	prison gang activities of the Irish Mob and
			the UAB.
		c/o J. Spencer	
		Bryan,	
		9 E. 4 th Street, Ste.	
		307,	
		Tulsa, OK 74103	
30	Cordell Johnson*	918.935.2777	Plaintiff.
			Inmate gang member of the UAB,
			participated in the gang fight on CN
		c/o Oklahoma	housing unit on 9/12/15. He is expected to
		Department of	testify to his knowledge regarding the
		Corrections	prison gang activities of the Irish Mob and
31	Jared Cruce*	DOC #454513	the UAB.
		c/o Oklahoma	Inmate gang member of the UAB. He is
		Department of	expected to testify to his knowledge
		Corrections	regarding the prison gang activities of the
32	Dylan Shanks*	DOC #280876	Irish Mob and the UAB.
		c/o Oklahoma	Inmate gang member of the Irish Mob. He
		Department of	is expected to testify to his knowledge
		Corrections	regarding the prison gang activities of the
33	Larry Tosh*	DOC #237340	Irish Mob and the UAB.
			Inmate gang member of the Irish Mob.
			Participated in the gang fight on CN
		c/o Oklahoma	housing unit on 9/12/15. He is expected to
		Department of	testify to his knowledge regarding the
		Corrections	prison gang activities of the Irish Mob and
34	Shawn Schneider*	DOC #438871	the UAB.
		c/o Oklahoma	Inmate gang member of the UAB. He is
		Department of	expected to testify to his knowledge
	Christopher	Corrections	regarding the prison gang activities of the
35	Shepherd	DOC #193026	Irish Mob and the UAB.
		c/o Oklahoma	Inmate gang member of the UAB. He is
		Department of	expected to testify to his knowledge
		Corrections	regarding the prison gang activities of the
36	Brandon Maxwell	DOC #651311	Irish Mob and the UAB.
			Inmate gang member of the Irish Mob.
			Participated in the gang fight on CN
			housing unit on 9/12/15. He is expected to
		a	testify to his knowledge regarding the
		8507 E. 11 th	prison gang activities of the Irish Mob and
37	Joshua Tolley	Tulsa, OK 74112	the UAB.
		c/o Oklahoma	Inmate gang member of the Irish Mob.
		Department of	Participated in the gang fight on CN
		Corrections	housing unit on 9/12/15. He is expected to
38	Jason McHone	DOC #205513	testify to his knowledge regarding the

			prison gang activities of the Irish Mob and the UAB.
39	Steven Thompson	c/o Oklahoma Department of Corrections DOC #703298	Inmate gang member of the Irish Mob. Participated in the gang fight on CN housing unit on 9/12/15. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and the UAB.
		Okay, Oklahoma	Witness to gang fight on CN housing unit on 9/12/15.
40	William Fulk*	74447	
41	Richard Ayala	c/o Oklahoma Department of Corrections DOC #224232	Inmate gang member housed on CN housing unit on 9/12/15. He is expected to testify to his knowledge regarding prison gang activities.
42	Shannon Bandy*	c/o Darrell Moore J. Ralph Moore, P.C. P.O. Box 368 Pryor, OK 74362 (918) 825-0332	Former Human Resources manager at Cimarron Correctional Facility. She will testify regarding staffing and recruitment at Cimarron Correctional Facility.
43	Lenita Gillespie*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Business Manager, Cimarron Correctional Facility. She will testify regarding business operations at the Cimarron facility.
	Kari Kaiser*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Current Quality Assurance Manager at Cimarron Correctional Facility. She will testify regarding quality assurance measures at Cimarron Correctional Facility.
	Cheryl Kazlaskas	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Former Quality Assurance Manager at Cimarron Correctional Facility. She will testify regarding quality assurance measures at Cimarron Correctional Facility.
		c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023	Current Human Resources manager at Cimarron Correctional Facility. She will testify regarding staffing and recruitment
46	Lorrie Belcher	918.225.3336	at Cimarron Correctional Facility.
47	Mark Swafford*	Detective, Sapulpa Police Department, 20 N. Walnut St., Sapulpa, OK 74066	He will testify regarding forensic download of contraband cellphone recovered from Christopher Tignor.
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		(918) 224-3862	
48	Danni Creech*	Board of Medicolegal Investigations, Office of Chief Medical Examiner, 901 N. Stonewall, Oklahoma City, OK 73117	She will testify regarding contraband cellphone recovered from Christopher Tignor.
49	Martin Reed	ODOC 3400 Martin Luther King Ave OKC, OK (405) 425-2515	Mr. Reed is an Agent with the Office of Inspector General for the Oklahoma Department of Corrections. He is expected to testify regarding an investigation he performed of the 9/12/15 incident on the CN housing unit, Cimarron Correctional Facility.
50	Cheri Bolz	ODOC 3400 Martin Luther King Ave OKC, OK (405) 425-2515	Ms. Bolz is an Agent with the Office of Inspector General for the Oklahoma Department of Corrections. She is expected to testify regarding an investigation she performed of the 9/12/15 incident on the CN housing unit, Cimarron Correctional Facility.
51	Rachael Rogers	ODOC 3400 Martin Luther King Ave OKC, OK (405) 425-2515	Ms. Rogers is an Agent with the Office of Inspector General for the Oklahoma Department of Corrections. She is expected to testify regarding an investigation she performed of the 9/12/15 incident on the CN housing unit, Cimarron Correctional Facility.
	Greg Jones*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Facility investigator, Cimarron Correctional Facility.
	Todd Hill*	c/o Oklahoma Department of Corrections DOC #699938	Witness to gang fight on CN housing unit on 9/12/15.
54	Gage Broom	c/o Oklahoma Department of Corrections DOC #606294	Inmate gang member of the Irish Mob. Participated in the gang fight on CN housing unit on 9/12/15. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and the UAB.

			Witness to gong fight on CN housing unit
		2000 C 1-4 D 1	Witness to gang fight on CN housing unit
	T.1 .1 O1' #	2999 Sandstone Rd	on 9/12/15.
55	Johnathan Olive*	Durant, OK 74701	
			Inmate gang member of the Irish Mob.
			Participated in the gang fight on CN
		c/o Oklahoma	housing unit on 9/12/15. He is expected to
		Department of	testify to his knowledge regarding the
		Corrections	prison gang activities of the Irish Mob and
56	Ashton W. Kelle	DOC #604566	the UAB.
			Inmate gang member housed on CN
		c/o Oklahoma	housing unit on 9/12/15. He is expected to
		Department of	testify to his knowledge regarding the
		Corrections	prison gang activities of the Irish Mob and
57	Kenneth Harris*	DOC #516004	the UAB.
37	130moul Hallis	c/o Oklahoma	Inmate gang member of the UAB. He is
		Department of	expected to testify to his knowledge
		Corrections	regarding the prison gang activities of the
50	Joshua Boffer	DOC #469661	Irish Mob and the UAB.
30	JOSHUA DOHEL	DOC π 1 0/001	Inmate gang member of the UAB.
		c/o Oklahoma	Participant in gang fight on 9/12/15. He is
		Department of	expected to testify to his knowledge
		Corrections	= = = = = = = = = = = = = = = = = = =
50	Issas IIssad		regarding the prison gang activities of the
59	Jesse Hood	DOC #444271	Irish Mob and the UAB.
		c/o Oklahoma	Inmate gang member of the UAB. He is
		Department of	expected to testify to his knowledge
	D	Corrections	regarding the prison gang activities of the
60	Richard Potts	DOC #228458	Irish Mob and the UAB.
		c/o CCF	
		3200 Kings Hwy	
		Cushing, Oklahoma	
		74023	Facility physician, Cimarron Correctional
61	Charles Paine*	918.225.3336	Facility
		c/o Darrell Moore	
		J. Ralph Moore, P.C.	
		P.O. Box 368	
		Pryor, OK 74362	
62	Gary Deland*	(918) 825-0332	Expert witness retained by Defendant.
		c/o Darrell Moore	
		J. Ralph Moore, P.C.	
		P.O. Box 368	
	Curtis T. Grundy,	Pryor, OK 74362	
63	Ph.D.*	(918) 825-0332	Expert witness retained by Defendant.
		ODOC	
		3400 Martin Luther	
		King Ave	Administrative Director, Division of West
64	Julie Rose*	OKC, OK	Institutions, Oklahoma DOC
<u> </u>		,	

		(405) 425-2515	
		c/o CCF	
		3200 Kings Hwy	
		Cushing, Oklahoma	
		74023	
65	Ken Avant*	918.225.3336	Facility Management
0.5	TCH TIVUIT	c/o Darrell Moore	Tuenity Munugement
		J. Ralph Moore, P.C.	
		P.O. Box 368	Former Warden, Davis Correctional
		Pryor, OK 74362	Facility and Cimarron Correctional
66	Tim Wilkinson *	(918) 825-0332	Facility
00	THII WHKIIISOH	` '	racinty
		c/o CCF	
		3200 Kings Hwy	
		Cushing, Oklahoma	
6 7	G IIII !	74023	
67	Scott Whitson	918.225.3336	Facility Management & Maintenance
		c/o CCF	
		3200 Kings Hwy	
		Cushing, Oklahoma	
		74023	Maintenance supervisor, Cimarron
68	Gerald Ragan*	918.225.3336	Correctional Facility
		ODOC	
		3400 Martin Luther	
		King Ave	
		OKC, OK	Former Assistant Warden, Cimarron
69	Jeorld Braggs	(405) 425-2515	Correctional Facility
		c/o Darrell Moore	
		J. Ralph Moore, P.C.	Corrections Sergeant, Davis Correctional
		P.O. Box 368	Facility. He is expected to testify to his
		Pryor, OK 74362	knowledge regarding the prison gang
70	Mark Mowers*	(918) 825-0332	activities of the Irish Mob and the UAB.
		c/o CCF	
		3200 Kings Hwy	
		Cushing, Oklahoma	
		74023	Kitchen Supervisor, Cimarron
71	Frank O'Clair*	918.225.3336	Correctional Facility
			Corrections Sergeant, Cimarron
		c/o CCF	Correctional Facility. He is expected to
		3200 Kings Hwy	testify to his knowledge regarding the
		Cushing, Oklahoma	prison gang activities of the Irish Mob and
		74023	the UAB and the participants in the
72	Jacob Gibson*	918.225.3336	incident of 9/12/15.
		c/o CCF	Classifications supervisor, Cimarron
		3200 Kings Hwy	Correctional Facility. She is expected to
		Cushing, Oklahoma	testify to her knowledge regarding the
73	Sylvia Waters*	74023	inmate classifications of the Irish Mob and

		918.225.3336	the UAB participants in the incident of 9/12/15.
74	Mike Munday*	c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023 918.225.3336	Training manager, Cimarron Correctional Facility. He is expected to testify regarding the training program at the prison facility.
		c/o CCF 3200 Kings Hwy Cushing, Oklahoma 74023	Corrections Sergeant, Cimarron Correctional Facility. He is expected to testify to his knowledge regarding the prison gang activities of the Irish Mob and
75	Tim Plourd	918.225.3336	the UAB.
76	All witnesses listed by Plaintiff and not objected to by Defendant.		
	All witnesses necessary for the purposes of authentication.		
78	All witnesses necessary for the purposes of rebuttal.		
79	All witnesses necessary for the purposes of impeachment.		

Defendant reserves the right to supplement this list as discovery is ongoing.

Respectfully submitted,

Defendant CCA

DARRELL L. MOORE, OBA 6332

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Certificate of Service

☑I hereby certify that on June 14, 2018, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

All attorneys of record

 \Box I hereby certify that on June 14, 2018, I served the attached document by regular US Mail on the following, who are not registered participants of the ECF System:

DARRELL L. MOORE

Dans Solm